

District

General Permit Template

**MUNICIPAL SOLID WASTE LANDFILL SERIES 1 –
EMISSION GUIDELINE REQUIREMENTS**

Template # SJV- MSWL -1-0

**Municipal solid waste landfills (MSWL) with design capacity equal
to or greater than 2.5 million megagrams and 2.5 million cubic
meters, and**

Constructed, reconstructed or modified before May 30, 1991

This template is designed to streamline the District and Title V permitting processes for municipal solid waste landfills meeting the above qualifications. District permit applicants choosing to use this template will have to complete the enclosed template qualification form and submit it with their application.

San Joaquin Valley Air Pollution Control District

Final

District General Permit Template

Municipal Solid Waste Landfills Series 1 – Emission

Guideline Requirements

Template No: SJV-MSWL-1-0

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FINAL DECISION DATE:

San Joaquin Valley Air Pollution Control District

District General Permit Template SJV-MSWL-1-0

Engineering Evaluation

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Template SJV-MSWL-1-0

I. Purpose

The purpose of the proposed template is to streamline the District and Title V permitting processes by identifying applicable requirements for municipal solid waste landfills and to establish permit conditions which will ensure compliance with such requirements. Template conditions will be used to create District permits for facilities. These conditions will be incorporated into the District permit of any facility choosing to make use of the template.

The District permits will be submitted to the USEPA as part of the State plan to implement 40 CFR 60 Subpart Cc guidelines for municipal solid waste landfills. Upon approval of the state plan, the requirements established pursuant to subpart Cc will become Federally enforceable. The District will administratively convert the District permit to a Title V operating permit, in accordance with District Rule 2520, Federally Mandated Operating Permits. These conditions will be incorporated into the District permit of any facility choosing to make use of the template.

II. Template Applicability

The template applies to any municipal solid waste landfill (MSWL) which:

has a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, and

was constructed, reconstructed or modified before May 30, 1991.

The applicability of this template is determined by completion of the Template Qualification Form (TQF) attached as Appendix B. The completed and signed TQF must be submitted with the District permit application.

III. Applicable Requirements

District permits contain requirements which are enforceable only by the District. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. Upon subsequent issuance of the facility Title V operating permit, the permit may contain both federally enforceable and District-only requirements. Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable.

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Table 1, Applicable Requirements, does not necessarily include all enforceable requirements that apply to municipal solid waste landfills qualifying to use this template. It is the source's responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis or are covered by other templates.

Table 1. Applicable Requirements

Rule Category	Rule/Regulation	Citation	Description
A	EG	Subpart Cc	Emission Guidelines and Compliance Times for Municipal Solid Waste Landfills
A	SJVUAPCD Reg. II	2520, 9.5.2 ¹	Federally Mandated Operating Permits
B	SJVUAPCD Reg. II	2201	New and Modified Stationary Source Review

Category "A" rules contain requirements that are directly applicable to the qualifying units; compliance with these applicable requirements will be demonstrated in this engineering evaluation and assured by the template permit conditions. In section IV, Compliance, the requirements from category "A" rules are listed with a discussion of how compliance with these requirements, which will be federally enforceable upon Title V permit issuance, is achieved.

Category "B" rules contain enforceable requirements that were not addressed in this template. These may not be all of the requirements, aside from those listed in category "A", for this unit which will be federally enforceable upon Title V permit issuance. Requirements from these rules must be addressed by the applicant outside of this template within the District permit application. Category "B" listing is included in this table as an informational item to assist applicants in this effort.

IV. Compliance

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

A. District Rule 2520, 9.5.2

¹ District Rule 2520 is not currently applicable to landfills qualifying to use this template, but will become applicable upon approval of the State Plan to implement the Emission Guidelines. Upon approval of the State Plan, the District permit of sources subject to the Emission Guidelines will be administratively converted to a Title V Operating Permit. Any source choosing to use this template has accepted this enhanced administrative permit process.

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District Rule 2520 will become applicable to any MSWL qualifying to use this template, upon approval of the State plan to implement the Emission Guidelines. Section 9.5.2 requires all records to be maintained for at least 5 years. The recordkeeping requirements of 40 CFR 60, Subpart Cc, are at least as strict (refer to this section for compliance). Conditions assuring compliance with general requirements from District Rule 2520, Federally Mandated Operating Permits, will be contained in the facility-wide requirements.

B. 40 CFR 60, Subpart Cc

Subpart Cc, Emission Guidelines, requires sources with capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters to perform periodic calculations and submit periodic reports. Should the nonmethane organic compounds (NMOC) emission rate exceed 50 megagrams/year at an affected facility, the landfill is required to design and install a collection and control system, according to design plan submittal. Compliance with Emission Guideline requirements is addressed in the following manner:

Section 60.32c(c) requires affected MSWLs with design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters to be permitted under Title V. Compliance is assured by template permit condition 22. Section 60.32c(d) states that when MSWL is closed, the owner or operator is no longer subject to the requirement to maintain the Title V permit if either of the following conditions are met: 1) the landfill was never subject to the requirement to have a control system, pursuant to the Emission Guidelines of 40 CFR 60 Subpart Cc or 2) the owner or operator meet the conditions for control system removal, pursuant to 60.752(b)(2)(v). Template permit condition 16 assures compliance with this requirement.

Section 60.33c(b) and 60.33c(c) require collection and control systems, subject to Cc, meet certain design requirements. Template permit conditions 18, 19, and 20 assure compliance with these requirements.

Section 60.34c states that a collection and control system must meet the operational standards in 40 CFR 60.753 and; a controlled landfill must meet the compliance provision in 40 CFR 60.755 and the monitoring provision in 40 CFR 60.756. Template permit conditions 19 and 20 assures compliance with these requirements. Once the collection and control system is installed at affected facilities, compliance with system specific requirements will be addressed through modification of the permit. Section 60.34c also states that the NMOC emission rate be calculated using the values and procedures in 40 CFR 60.754 to determine if

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emissions equal or exceed 50 megagrams/yr. Refer to the compliance discussion under Subpart WWW for compliance with these requirements.

Section 60.35c states that recordkeeping and reporting provisions in sections 60.757 and 60.758 shall be followed. Refer to the compliance discussion under Subpart WWW for compliance with these requirements.

Sections 60.36c(a) and (b) address compliance times for installation of a collection and control system at a MSWL whose emissions have exceeded 50 megagrams/yr. The Emission Guidelines requires installation within 30 months of the date of the first NMOC emission rate report that shows exceedance of the limit. Compliance with this section is assured by template permit conditions 18 and 19.

C. 40 CFR 60, Subpart WWW

Subpart WWW contains requirements applicable to existing MSWL, as referenced by 40 CFR 60, Subpart Cc. Compliance with these requirements is addressed as follows:

Section 60.752(a) and (b) contain requirements for submittal of initial and subsequent design capacity and NMOC emission reports. Conditions addressing submittal of the initial design capacity and initial NMOC emission rate reports to the APCO are not included in this template. These requirements are extraneous, since landfills are required to submit these reports to the APCO, with their permit application for the landfill. The submittal of amended design capacity reports is not required for sources which qualify to use this template since they have design capacities above the limits of 2.5 million megagrams and 2.5 million cubic meters prior to any modification. Only landfills that undergo a modification to increase the design capacity above the 2.5 million megagrams and 2.5 million cubic meters limits will become subject to the NSPS for landfills, 40 CFR 60 Subpart WWW. Compliance with subsequent NMOC emission report submittal is assured by template permit conditions 9 and 16 through 19 and is also required pursuant to sections 60.754(a) and 60.757(b).

Sections 60.753, 60.755 and 60.756 address operational standards, compliance provisions and monitoring of installed collection and control systems. These system specific requirements will become applicable once a gas collection and control system, pursuant to Subpart Cc, is installed. Compliance is assured through conditions 19 and 20.

Sections 60.754(a) and (c) contain test methods and procedures for calculating NMOC emission rates. Compliance is assured by template

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permit conditions 1 through 9. Sections 60.754(b) and (d) contain requirements applicable to a MSWL after the installation of a collection and control system. Compliance with these requirements is assured by template permit conditions 19 and 20.

Section 60.757(a) addresses initial and subsequent design capacity report submittal. As already mentioned under 60.752(a) and (b), this section is not applicable to sources qualifying to use this template. Sections 60.757(b), (c) and (d) address reporting requirements for NMOC emission rates and landfill closure reports. Compliance with these sections is assured by template permit conditions 9 through 14 and 17. Sections 60.757(e), (f) and (g) address reporting requirements for controlled landfills. Compliance with these requirements is assured by template permit conditions 19 and 20.

Section 60.758, except section 60.758(a), contains recordkeeping requirements for a MSWL with collection and control system devices. Compliance with these requirements is assured by template permit conditions 19 and 20. Section 60.758(a) addresses recordkeeping requirements for design capacity, solid waste in-place and waste acceptance rate. Compliance is assured by template permit condition 15.

Section 60.759 contains specifications for MSWL gas active collection systems. Compliance with any potential applicability of these requirements is assured by template permit conditions 19 and 20.

V. Permit Shield

A permit shield, according to District Rule 2520, 13.2, legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit.

Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements from 40 CFR 60, Subpart Cc. A permit shield is requested in template permit condition 21.

VI. Permit Conditions

The following conditions will be incorporated into the District permit of any facility choosing to make use of template #SJV-MSWL-1-0:

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1. The NMOC emission rate shall be calculated using the equation in 40CFR60.754(a)(1)(i), if the actual year-to-year solid waste acceptance rate is known or the equation in 40CFR60.754(a)(1)(ii), if the actual year-to-year solid waste acceptance rate is unknown. The values for k, Lo, and CNMOC for both equations shall be taken from 40CFR60.754(a)(1), as appropriate. Both equations may be used if the actual year-to-year acceptance rate is known for a part of the landfill life, but unknown for another part of the landfill life. The mass of nondegradable solid waste may be subtracted from the average annual acceptance rate when calculating R, if documentation of the nature and amount of such wastes is maintained. (Tier 1 specifications) [60.754(a)(1) and 60.34c]
2. If the calculated NMOC emission rate is equal to or greater than 50 megagrams/year, then the landfill owner or operator shall either comply with the requirements of this permit to submit a collection and control design plan and install the system, or determine a site-specific NMOC concentration and recalculate the NMOC emission rate using Tier 2 specifications. [60.754(a)(2)(ii) and 60.34c]
3. Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) For sampling, at least 2 sample probes shall be installed per hectare of landfill surface that has retained waste for at least 2 years, up to a maximum of 50 required probes. One sample of landfill gas shall be collected from each probe to determine the NMOC concentration, using EPA Method 25C or 18. If EPA Method 18 is used, the minimum list of compounds to be tested shall be those published in the most recent Compilation of AP-42. If composite sampling is used, equal sample volumes are required. All samples taken shall be used in the analysis. The NMOC concentration from Method 25C shall be divided by 6 to convert from C-NMOC, as carbon to as hexane. [60.754(a)(3) and 60.34c]
4. Tier 2 specifications to determine the site-specific NMOC concentration shall include the following: 1) The NMOC mass emission rate shall be recalculated using the average site-specific concentration, instead of the default value, 2) If the resulting calculated mass emission rate is equal to or greater than 50 megagrams/year, the landfill owner or operator shall either comply with 60.752(b)(2), or determine a site-specific methane generation rate constant and recalculate the NMOC emission rate using Tier 3 specifications. [60.754(a)(3)(i)&(ii) and 60.34c]
5. If the calculated NMOC mass emission rate, using the site-specific NMOC concentration, is less than 50 megagrams/year, then a periodic estimate of the emission rate report, pursuant to 60.757(b)(1) shall be submitted to the Administrator. The site-specific NMOC concentration shall be retested every 5 years, using Tier 2 specifications. [60.754(a)(3)(iii) and 60.34c]
6. Tier 3 specifications to determine the site-specific methane generation rate constant shall include the following: 1) EPA Method 2E shall be used, 2) The NMOC mass emission rate shall be recalculated using the average site-specific NMOC concentration and the site-specific methane generation rate constant k, instead of the default values in 40 CFR 60(a)(1), and 3) If the resulting calculated NMOC mass emission rate is equal to or greater than 50 megagrams/year, the landfill owner or operator shall comply with 60.752(b)(2). [60.754(a)(4) and (i) and 60.34c]
7. If Tier 3 specifications are used to determine the site-specific methane generation rate and the calculated NMOC mass emission rate is less than 50 megagrams/year, then a periodic emission rate report shall be submitted to the Administrator, pursuant to 60.757(b)(1) and the NMOC concentration shall be recalculated annually, pursuant to 60.757(b)(1), using the site-specific methane generation rate constant and the NMOC concentration obtained using Tier 2

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specifications. Determination of the site-specific methane generation rate constant is performed once and used in all subsequent annual NMOC emission rate calculations. [60.754(a)(4)(ii) and 60.34c]

8. For PSD purposes, the NMOC emission rate shall be estimated and compared to the PSD major source and significance levels in 40 CFR 51.166 or 52.21, using AP-42 or EPA-approved procedures. [60.754(c) and 60.34c]
9. The NMOC emission rate shall be recalculated and reported to the APCO annually, except as otherwise provided in this permit, until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams/year and a collection and control system is installed or until the landfill is closed. [40 CFR 60.752(b)(1), 60.754(a), 60.757(b), 60.34c and 60.35c]
10. If the NMOC emission rate, as reported in the annual report is less than 50 megagrams/year in each of the next 5 consecutive years, the owner or operator may elect to submit an estimate of the NMOC emission rate for the next 5-year period in lieu of the annual reports for those 5 years. This estimate shall include the current amount of solid waste-in-place and the estimated waste acceptance rate for each year of the 5 years. All data and calculations upon which this estimate is based shall be provided to the APCO. This estimate shall be revised at least once every 5 years. [60.757(b)(1)(ii) and 60.35c]
11. If the actual waste acceptance rate exceeds the estimated rate used in any year reported in a 5-year estimate of the NMOC emission rate, then a revised 5-year estimate shall be submitted to the APCO. The revised estimate shall cover the 5-year period beginning with the year in which the actual waste acceptance rate exceeded the estimated acceptance rate. [40 CFR 60.757(b)(1)(ii) and 60.35c]
12. The NMOC emission rate report shall include all the data, calculations, sample reports and measurements used to estimate the annual or 5-year emissions. [40 CFR 60.757(b)(2) and 60.35c]
13. If the owner or operator elects to recalculate the NMOC emission rate using Tier 2 specifications and the resulting NMOC emission rate is less than 50 megagrams/year, annual periodic reporting shall resume. The revised NMOC emission rate report, with the recalculated NMOC emission rate using Tier 2 specifications, shall be submitted within 180 days of the first Tier 1 calculated exceedance of 50 megagrams/year. [40 CFR 60.757(c)(1) and 60.35c]
14. If the owner or operator elects to recalculate the NMOC emission rate using Tier 3 specifications and the resulting NMOC emission rate is less than 50 megagrams/year, annual periodic reporting shall resume. The revised NMOC emission rate report, with the recalculated NMOC emission rate using Tier 3 specifications, shall be submitted within 1 year of the first Tier 1 calculated exceedance of 50 megagrams/year. [40 CFR 60.757(c)(2) and 60.35c]
15. Each owner or operator shall keep for at least 5 years up-to-date, readily accessible, on-site records of the maximum design capacity, the current amount of solid waste in-place, and the year-by-year waste acceptance rate. Off-site records may be maintained if they are retrievable within 4 hours. [60.758(a), 60.35c and District Rule 2520, 9.5.2]

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16. This operating permit may be cancelled with APCO approval when the landfill 1) is closed, pursuant to the requirements of this permit, 2) never needed control, and 3) is not otherwise subject to the requirements of part 40 CFR 70. [40 CFR 60.32c(d) and 60.752(b)]
17. If the landfill is permanently closed, a closure notification shall be submitted to the APCO within 30 days of waste disposal cessation. A permanent closure must take place in accordance with 40 CFR 258.60. If a closure report has been submitted, no additional waste may be placed in the landfill without filing a notification of modification to the APCO, pursuant to 40 CFR 60.7(a)(4). [40 CFR 60.752(b)(1)(ii)(B), 60.757(d) and 60.35c]
18. If the calculated NMOC is equal to or greater than 50 megagrams/year, the owner or operator shall submit a collection and control system design plan, pursuant to 40 CFR 60.752(b)(2)(i) and prepared by a professional engineer, to the APCO within 1 year of that determination. [40 CFR 60.752(b)(2)(i) and 60.36c(b)]
19. If the calculated NMOC is equal to or greater than 50 megagrams/year, the owner or operator shall install a collection and control system, that effectively captures the gas generated within the landfill, within 30 months of that determination. This operating permit must be modified accordingly to show compliance with 40 CFR 60, Subpart Cc requirements applicable to a MSWL with a collection and control system. [40 CFR 60.752(b)(2)(ii), 60.753, 60.755, 60.756, 60.34c and 60.36c(b)]
20. If a gas collection and control system is installed, it shall comply with the operational standards of 40 CFR 60.753, the compliance provisions of 40 CFR 60.755, the monitoring provisions of 40 CFR 60.756, the reporting and recordkeeping requirements of 40 CFR 60.757 and 60.758, and the requirements of 40 CFR 60.759 (for active collection systems). [40 CFR 60.34c; 40 CFR 60.752(b)(2)(ii), 60.753, 60.755, 60.756, 60.757, 60.758, and 60.759].
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with EPA-approved State Plan for implementing 40 CFR 60, Subpart Cc. A permit shield is granted from this requirement. [District Rule 2520, 13.2]
22. The issuance of this permit has met the procedural requirements of 40 CFR part 70. This permit shall be converted to a Title V operating permit and these conditions shall become federally enforceable through administrative amendment, upon approval of the State plan to implement the Emission Guidelines. [District Rule 2520, 3.2; 40 CFR 60.32c(c) and 60.33c(a)]

APPENDIX A

EPA COMMENTS/DISTRICT RESPONSES
FOR
TEMPLATE #SJV-MSWL-1-0

Template SJV-MSWL-1-0

EPA COMMENTS/ DISTRICT RESPONSE

The United States Environmental Protection Agency's comments regarding the General Permit Templates for Municipal Solid Waste Landfills (SJV-UL-0-0 and SJV-MSWL-1-0) are summarized below, and is followed by the District's responses. A copy of the EPA's letter dated July 10, 1998 is available at the District.

1. EPA COMMENT

Umbrella Template (SJV-UL-0-0): The template does not include the requirements from 40 CFR 60 Subpart Cc or 40 CFR 60 Subpart WWW as applicable requirements. These requirements should be added as category B requirements in Table 1.

DISTRICT RESPONSE

References to 40 CFR 60 Subpart Cc and 40 CFR 60 Subpart WWW have been added in Table 1 as category B requirements.

2. EPA COMMENT

EG Template (SJV-MSWL-1-0): If the District intends to use the permits issued using the EG template as the enforceable mechanism for implementing the EG, the template should include the requirements for facilities that have installed a gas collection and control system.

DISTRICT RESPONSE

To satisfy the requirements associated with an installed gas collection and control system, Condition 20 has been added to ensure compliance with the gas collection and control system requirements of 40 CFR 60.34c and 40 CFR 60.752(b)(2): "If a gas collection and control system is installed, it shall comply with the operational standards of 40 CFR 60.753, the compliance provisions of 40 CFR 60.755, the monitoring provisions of 40 CFR 60, the reporting and recordkeeping requirements of 40 CFR 60.757 and 60.758, and the requirements of 40 CFR 60.759 (for active collection systems). [40 CFR 60.34c; 40 CFR 60.752(b)(2)(ii), 60.753, 60.755, 60.756, 60.757, 60.758, and 60.759]."

3. EPA COMMENT

Conversion to Title V Permit: Since these templates are for the issuance of District permits and not Title V permits, these permits cannot be changed administratively to Title V permits.

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DISTRICT RESPONSE

The District agrees that these templates, as labelled, are for the issuance of District operating permits. However, these permits will be issued through an enhanced NSR process (i.e. the facilities are required to submit a certificate of conformity and the permits will go through public notification) that will satisfy the public participation requirements of California's 111(d) State Plan and Title V. This process was approved in a December 30, 1997 letter from Peter D. Venturini at the California Air Resources Board. The letter recognized that the District's enhanced NSR process "satisfies the requirements for a federal Title V permit" and "can simultaneously satisfy the public participation requirements of the state plan and Title V". Furthermore, once the permits are approved into the State Plan and are federally enforceable, SIP-approve District Rule 2520 Federally Mandated Operating Permits will become applicable. As per section 11.2.1 of Rule 2520, "For applications meeting the qualifications as specified in a model general permit, the APCO may issue a general permit containing the terms and conditions of the model general permit without repeating the public participation procedures required under 11.1.4 of this rule". Therefore by following this approved process, the District has the authority and intends to administratively convert the State Plan-approved permits into Title V permits.

4. EPA COMMENT

EG Template (SJV-MSWL-1-0): Table 1. Applicable Requirements must refer to EG not NSPS.

DISTRICT RESPONSE

Table 1 of the EG Template (SJV-MSWL-1-0) has been revised to refer to the Emission Guidelines as the applicable Rule/Regulation.

5. EPA COMMENT

EG Template (SJV-MSWL-1-0): The reference to NSPS in the second paragraph of Section IV.B should be changed to reference the Emission Guidelines – 40 CFR 60 Subpart Cc.

DISTRICT RESPONSE

The second paragraph in Section IV.B has been revised to the following, "pursuant to the Emission Guidelines of 40 CFR 60 Subpart Cc."

6. EPA COMMENT

EG Template (SJV-MSWL-1-0): The fourth sentence, second paragraph of Section IV.C, which starts with "The submittal of amended...", should be changed to reflect that a municipal solid waste landfill subject to the EG will become subject to the NSPS if it undergoes a modification to expand.

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DISTRICT RESPONSE

This sentence has been clarified to read, “The submittal of amended design capacity reports is not required for sources which qualify to use this template since they have design capacities above the limits of 2.5 million megagrams and 2.5 million cubic meters prior to any modification. Only landfills that undergo a modification to increase the design capacity above the 2.5 million megagrams and 2.5 million cubic meters limits will become subject to the NSPS for landfills, 40 CFR 60 Subpart WWW.”

7. EPA COMMENT

EG Template (SJV-MSWL-1-0): Condition 14 incorrectly states that the revised NMOC emission rate report, using Tier 3 specifications, is due within 1 year of the first Tier 2 calculated exceedance of 50 Mg/yr. Instead, the revised NMOC emission rate report is due within 1 year of the first Tier 1 calculated exceedance of 50 Mg/yr.

DISTRICT RESPONSE

Condition 14 has been revised as follows: “The revised NMOC emission rate report, with the recalculated NMOC emission rate using Tier 3 specifications, shall be submitted within 1 year of the first Tier 1 calculated exceedance of 50 megagrams/year.”

8. EPA COMMENT

EG Template (SJV-MSWL-1-0): The phrase “the EPA-approved State Plan for implementing” should be added after “deemed compliance with” in condition 20.

DISTRICT RESPONSE

The condition has been revised and renumbered as condition 21 as follows: “Compliance with permit conditions in the Title V permit shall be deemed compliance with the EPA-approved State Plan for implementing 40 CFR 60, Subpart Cc.”

9. EPA COMMENT

EG Template (SJV-MSWL-1-0): Condition 21 should be deleted because District permits issued using the EG template cannot be simply administratively converted to Title V permits.

DISTRICT RESPONSE

See District Response in comment #3.

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10. EPA COMMENT

EG Template (SJV-MSWL-1-0): In conditions 2, 4, and 6, “landfill owner” should be changed to “landfill owner or operator”.

DISTRICT RESPONSE

The references to “landfill owner” in conditions 2, 4, and 6 have been changed to “landfill owner or operator”.

11. EPA COMMENT

EG Template (SJV-MSWL-1-0): Condition 4 has an incorrect regulatory citation. The correct citation at the end of this condition should be 40 CFR 60.754(a)(3)(i) & (ii).

DISTRICT RESPONSE

The regulatory citation has been revised to 40 CFR 60.754(a)(3)(i) & (ii).

12. EPA COMMENT

EG Template (SJV-MSWL-1-0): The phrase “other approved measurements” in condition 8 should be changed to “EPA-approved”.

DISTRICT RESPONSE

“Other approved measurements” has been changed to “EPA-approved”.

13. EPA COMMENT

EG Template (SJV-MSWL-1-0): Condition 17 should refer to the “APCO” and not the “Administrator”. Also, the word “place” in the third sentence should be changed to “placed”.

DISTRICT RESPONSE

The word “Administrator” in the first sentence has been replaced with “APCO”. The word “place” in the third sentence has been replaced with “placed”.

14. EPA COMMENT

EG Template (SJV-MSWL-1-0): Condition 18 has an incorrect regulatory citation. The correct citation at the end of this condition should be 40 CFR 60.752(b)(2)(i).

DISTRICT RESPONSE

The regulatory citation has been revised to 40 CFR 60.752(b)(2)(i).

15. EPA COMMENT

Umbrella Template (SJV-UL-0-0): In Section II. Template Applicability, an additional sentence after the first paragraph should be added stating that this template does not include the applicable requirements contained in the NSPS for landfills.

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DISTRICT RESPONSE

In Section III of the umbrella template, it states that not all enforceable requirements that apply to landfills are included in this template. Furthermore, Table 1. Applicable Requirements of Section III has been amended, as per EPA comment #1, to include references to the NSPS (40 CFR 60 Subpart WWW) and EG (40 CFR 60 Subpart Cc) as category B requirements (enforceable requirements not addressed in this template).

Therefore, the District believes that adding a similar statement in Section II is redundant and unnecessary.

16. EPA COMMENT

Umbrella Template (SJV-UL-0-0): The header of the Template Qualification Form has a typographical error; the header should be “SJV-UL-0-0” and not “SJV-UM-0-0”.

DISTRICT RESPONSE

The header has been corrected.

APPENDIX B

TEMPLATE QUALIFICATION FORM
FOR
TEMPLATE #SJV-MSWL-1-0

Template SJV-MSWL-1-0

District General Permit Template Qualification Form

District permit # or facility name and address _____

Please answer the questions in the table below. A municipal solid waste landfills which meets the criteria of this table is qualified to use this template as part of a District application. To use this template, remove this sheet and attach to application.

Yes	No	Description of Qualifying Units
		Is the source a municipal solid waste landfill (MSWL), as defined in 40 CFR 60, subpart Cc? If "yes", then continue to next question; otherwise STOP - you cannot use this template.
		Did this MSWL commence construction, reconstruction or modification prior to May 30, 1991; and has it accepted waste at any time since November 8, 1987 or does it have additional design capacity available for future waste deposition? [40 CFR 60.32c and 60.33c(a)(1)] If "yes" then continue to next question; otherwise STOP - you cannot use this template.
		Does this MSWL have a design capacity equal to or greater than 2.5 million megagrams by mass and 2.5 million cubic meters by volume, with documented density conversions? [40 CFR 60.33c(a)(2)] If "yes" then continue to next question; otherwise STOP - you cannot use this template.
		Has the landfill owner or operator submitted the initial design capacity and NMOC emission rate reports to the District, with their permit application? If "yes", you qualify to use this template; otherwise - you cannot use this template.

Based on information and belief formed after reasonable inquiry: 1) the information on this form is true, accurate, and complete and 2) the facility is in compliance with this template's permit conditions.

Signature of Responsible Official

Date

Name of Responsible Official (Please print)